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February 5, 2024

VIA ECF

Hon. Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: ***Binh Thanh Import Export Prod. & Trade Joint Stock Co. v. Amazon.com Servs. LLC,***
No. 1:23-cv-00292-LGS – Letter Motion to File Under Seal

Your Honor:

On behalf of plaintiff Binh Thanh Import Export Production & Trade Joint Stock Co. (“Gilimex”) in the above action, and pursuant to the Court’s February 2, 2024 Order (Dkt. 80) granting Gilimex leave to amend its complaint, and February 5, 2024 Order (Dkt. 81) approving defendant Amazon.com Services LLC’s (“Amazon”) proposed redactions and ordering the sealing of the proposed First Amended Complaint (Dkts. 57, 58), we respectfully move the Court to treat as sealed the unredacted version of Gilimex’s First Amended Complaint. Gilimex has also filed a redacted version of the First Amended Complaint, consistent with redactions proposed by Amazon in its November 13, 2023 letter to the Court (Dkt. 61).

The First Amended Complaint references certain information provided by Amazon during discovery that has been designated by Amazon as CONFIDENTIAL or CONFIDENTIAL-ATTORNEY’S EYES ONLY pursuant to the February 21, 2023 Stipulation and Confidentiality Order (Dkt. 25). Given the confidentiality designations and the Court’s February 5, 2024 order, Gilimex has filed the unredacted First Amended Complaint under seal.

Respectfully,

/s/ Marc E. Kasowitz

cc: All Counsel of Record

KASOWITZ BENSON TORRES LLP

Hon. Lorna G. Schofield
February 5, 2024
Page 2 of 2

Appendix

Pursuant to Your Honor's Individual Rule I.D.3, included below is a list of all parties and attorneys of record who should have access to the sealed documents:

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Application GRANTED. The redacted information in the Amended Complaint is the same information that the Court previously allowed be filed in redacted form, with unredacted versions filed under seal, in the Order at Dkt. 81.

The Clerk of Court is respectfully directed to maintain Dkt. 83 under seal and to close the motion at Dkt. 82.

Dated: February 6, 2024
New York, New York



LORNA G. SCHOFIELD

UNITED STATES DISTRICT JUDGE